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1 **FILED**
2 Time 3:40 M
3 December 18, 1998
4 DENISE LUNDIN GLASS
5 CLERK SUPERIOR COURT
6 BY KL DEPUTY

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

8 **IN AND FOR THE COUNTY OF COCHISE**

9 **STATE OF ARIZONA,**) **CASE No. CR98000550**
10 Plaintiff,) **GJ No. 98-0576**
11 **vs.**) **INDICTMENT**
12 **JANICE L. WILSON,**)
13 Defendant.) **[DR#1997-046527]**

14
15 The grand jurors of the County of Cochise, in the name of the State of Arizona, and by
16 its authority accuse **JANICE L. WILSON** and charge that in Cochise County:

17 **COUNT ONE: FRAUDULENT SCHEME AND ARTIFICE**
18 **Class Two Felony**

19 Between May, 1994, and March, 1995, **JANICE L. WILSON**, pursuant to a scheme or artifice
20 to defraud, obtained a benefit from VERA LEWIS and the estate of Lloyd Lewis, by means of
21 false or fraudulent pretenses, representations, promises or material omissions.

22 In violation of A.R.S. §§ 13-2310; 13-603; 13-701; 13-702; 13-801; 13-804; and 13-811.

23 **COUNT TWO: FRAUDULENT SCHEME AND ARTIFICE**
24 **Class Two Felony**

25 On or about the 28th day of January, **JANICE L. WILSON**, pursuant to a scheme or artifice to
26 defraud, obtained a benefit from DANIEL LEWIS, by means of false or fraudulent pretenses,
27 representations, promises or material omissions.

28 In violation of A.R.S. §§ 13-2310; 13-603; 13-701; 13-702; 13-801; 13-804; and 13-811.

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1 **COUNT THREE: FINANCIAL EXPLOITATION OF A VULNERABLE ADULT**
2 **Class Two Felony**

3 Between May, 1994, and March, 1995, JANICE L. WILSON, in a position of trust and
4 confidence for VERA LEWIS, a vulnerable adult, and the estate of Lloyd Lewis, knowingly
5 controlled the assets of VERA LEWIS and the estate of Lloyd Lewis with the intent to
6 permanently deprive VERA LEWIS and the estate of Lloyd Lewis of money having a value of
7 approximately \$56,000.00.

8 In violation of A.R.S. §§ 46-456; 13-1802(A), (2) and (D) and/or (3) and (C); 13-603; 13-701;
9 13-702; 13-801; 13-804; 13-811; 13-2313; and 13-2314.

10 **COUNT FOUR: FINANCIAL EXPLOITATION OF A VULNERABLE ADULT**
11 **Class Three Felony**

12 On or about the 28th day of January, 1995, JANICE L. WILSON, in a position of trust and
13 confidence for DANIEL LEWIS, a vulnerable adult, knowingly controlled the assets of DANIEL
14 LEWIS with the intent to permanently deprive DANIEL LEWIS of money having a value of
15 approximately \$4,600.00.

16 In violation of A.R.S. §§ 46-456; 13-1802(A), (2) and (D) and/or (3) and (C); 13-603; 13-701;
17 13-702; 13-801; 13-804; 13-811; 13-2313; and 13-2314.

18 **ALAN K. POLLEY**
19 **COCHISE COUNTY ATTORNEY**

20 By: Sylvia E. Goodwin
21 **SYLVIA E. GOODWIN**
22 **Assistant Attorney General**

TRUE B. LL
[Signature]

23 **Foreperson of the Grand Jury**

24 Dated 12-18-98